

STORZER & ASSOCIATES, P.C.

Sieglinde K. Rath (SR7208)

Roman P. Storzer, *admitted pro hac vice*

Robert L. Greene, *admitted pro hac vice*

1025 Connecticut Ave., N.W. Suite 1000

Washington, D.C. 20036

Tel: 202.857.9766

Fax: 202.315.3996

Counsel for Plaintiffs

WILENTZ, GOLDMAN & SPITZER, P.A.

Donna M. Jennings (DJ7790)

90 Woodbridge Center Drive

Post Office Box 10

Woodbridge, New Jersey 07095

Co-Counsel for Plaintiff WR Property LLC

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New
York non-profit corporation, and WR PROPERTY
LLC, a New Jersey limited liability company,

Civ. No. 3:17-DV-03226

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,
MICHAEL REINA, ROBERT NIXON, HELENE
SCHLEGEL, JEFFREY PURPURO, WILLIAM
CAMPBELL, and KENNETH PIESLAK,

Defendants.

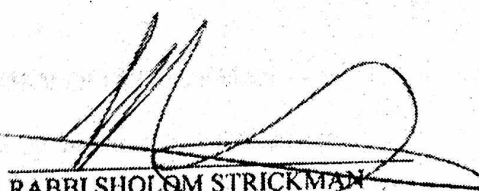
DECLARATION OF RABBI SHOLOM STRICKMAN

RABBI SHOLOM STRICKMAN declares as follows, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
2. I am the co-founder and dean of Yeshiva Gedola of South Jersey Inc., located at 411 Cross Street in Lakewood.
3. Our yeshiva is for young men ages 20-24. We have been open for 8 years.
4. It is the school's belief that we must have a dormitory for our students. Our students currently live in student housing in Lakewood. This arrangement does not fulfill the learning model of studying together that we believe must exist.
5. We believe that we should relocate to Jackson Township because most of our alumni live in Jackson Township. If we were located in Jackson Township, these alumni would be able to mentor students and come on a nightly basis to study and pray at our yeshiva, which is customary.
6. We also need to expand the yeshiva. We have had to turn away students because we lack capacity to accommodate additional students. Similarly, there are students who have expressed that they do not want to study with us because of our lack of infrastructure.
7. We have previously identified property in Jackson Township where we would want to build, but were advised that we couldn't build a dormitory in Jackson Township due to zoning laws.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August __, 2019



RABBI SHOLOM STRICKMAN